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Dockets Management Branch (HFA-305)
Food & Drug Administration
5630 Fishers Lane, Room#1061
Rockville, MD 20852

[Docket No. 98N-1038] Irradiation in the Production, Processing, and Handling of Food
Federal Register Vol. 64, No. 31, p. 7834

Dear Ms. Patricia Hansen:

The National Fisheries Institute is a non-profit trade association of approximately 1,000 companies involved in all aspects of the U.S. Fish and Seafood Industry. The NFI provides government relations, technological, and promotional services in support of industry objectives and goals. Part of the NFI mission is taking actions to ensure that there is an ample, sustainable, and safe seafood supply for consumers. In light of this mission directive, we would like to submit the following comments.

Irradiation is a process rather than a food additive and leaves no residue in the historical sense of the term. Given that the food is much the same after irradiation as it is before, labeling may not be warranted. Moreover, labeling may be an impediment to irradiated products if it is shown that such use causes undue consumer anxiety or decreased buying patterns. If a radiation disclosure statement and/or logo is deemed to be necessary, it should be no more prominent than the declaration of ingredients statement.

Additionally, if a radiation disclosure statement and/or logo is deemed to be necessary, the NFI feels that this disclosure should be phased out after consumers have adequate time to become familiar with products that are irradiated. This adjustment period should be delineated by a sunset clause that will end the mandatory irradiation disclosure after a certain period of time (e.g. 2 years).

The NFI appreciates this opportunity to make comments concerning the proposed rulemaking.

Sincerely,

Robert Collette (dd)

Robert Collette
Vice President
Science and Technology

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